

EXHIBIT A

From: David Perlson <davidperlson@quinnemanuel.com>
Sent: Thursday, July 20, 2017 3:00 PM
To: Gonzalez, Arturo J.; QE-Waymo
Cc: UberWaymoMoFoAttorneys; BSF_EXTERNAL_UberWaymoLit; Chatterjee, Neel (NChatterjee@goodwinlaw.com)
Subject: RE: Trial Stipulations

- External Email -

Arturo, we are happy to work together to narrow the issues for trial. However, it is not clear to us what specifically you are proposing in your email. Further, the only potential stipulation you raise seems to be premature because, as you note, it could be mooted by our motion in limine. If there are specific stipulations you wish to propose, please feel free to do so. But we do not think it makes sense to negotiate a stipulation along the lines you indicate below at this point in the case.

David

From: Gonzalez, Arturo J. [<mailto:AGonzalez@mofo.com>]
Sent: Wednesday, July 19, 2017 7:00 PM
To: QE-Waymo <gewaymo@quinnemanuel.com>
Cc: UberWaymoMoFoAttorneys <UberWaymoMoFoAttorneys@mofo.com>; BSF_EXTERNAL_UberWaymoLit <BSF_EXTERNAL_UberWaymoLit@BSFLLP.com>; Chatterjee, Neel (NChatterjee@goodwinlaw.com) <NChatterjee@goodwinlaw.com>
Subject: Trial Stipulations

Quinn Team:

We would like to discuss trial stipulations that would eliminate the need for certain witnesses. For example, there is an issue that you have raised in an in limine motion regarding Uber's search for downloaded materials. Obviously, if your motion is granted, the issue with respect to those facts may be moot. However, if your motion is denied, we believe we can stipulate to many of those facts. For example, on "x" date, 2 Waymo lawyers inspected Uber's facility located at [address]. And we can stipulate regarding the search terms that were used to look for "downloaded documents," and the inspections of Uber's devices. Please let us know if you would be willing to consider such stipulations. If so, we will put some in writing and send them your way.

If you have thoughts regarding trial stipulations, let us know.

Arturo J. González
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